

**UNITED STATES BANKRUPTCY COURT  
MIDDLE DISTRICT OF TENNESSEE**

IN RE:	)	
	)	
KEVIN CHRISTOPHER SHARPTON,	)	Case No. 15-02719-KL3-7
(SSN XXX-XX-1358)	)	(Chapter 7)
	)	Judge Keith M. Lundin
Debtor.	)	

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**MOTION FOR ORDER DIRECTING DEBTOR TO APPEAR  
FOR EXAMINATION AND PRODUCE DOCUMENTS**

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Pursuant to Bankruptcy Rule 2004(a), the movant, Susan Smith (the "Movant"), moves the Court for an order directing the debtor, Kevin Christopher Sharpton (the "Debtor"), to appear for examination and produce certain enumerated documents. In support of this motion, the Movant states as follows:

1. The Movant is a creditor and a party in interest in the above-captioned case holding a non-contingent, liquidated unsecured claim in the amount of at least \$52,416.75.
2. It is necessary to examine the Debtor promptly as to the acts, conduct, property and the administration of the Debtor's estate because of a recent accident involving damage to the Movant's collateral.
3. The Movant also seeks the production of documentary evidence in accordance with Bankruptcy Rule 2004(c). A list of the requested documents is set forth in the attached Exhibit A.

4. Upon the motion of any party in interest, the Court may order the examination of any entity and the production of documentary evidence. Bankruptcy Rule 2004(a) and (c).

5. The Movant requires a Bankruptcy Rule 2004 examination of the Debtor on or before June 28, 2015.

WHEREFORE, the Movant respectfully requests that the Court issue an order directing the attendance of the Debtor at a Bankruptcy Rule 2004 examination on or before June 28, 2015 beginning at 1:00 o'clock p.m. at Tune, Entrekin & White, P.C., UBS Tower, Suite 1700, 315 Deaderick Street, Nashville, Tennessee. The Movant further respectfully requests the entry of an order compelling the production of the documents as set forth in the attached Exhibit A on or before June 25, 2015.

Dated: May 28, 2015.

Respectfully submitted,

/s/ Joseph P. Rusnak  
Joseph P. Rusnak  
**TUNE, ENTREKIN & WHITE, P.C.**  
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Attorneys for the Movant

**Certificate of Service**

I hereby certify that a true and exact copy of the foregoing "Motion for Order Directing Debtor to Appear for Examination and Produce Documents" has been served upon the following counsel for parties in interest herein by delivering same to the offices of said counsel, or by mailing same to the office of said counsel by United States mail with sufficient postage thereon to carry the same to its destination:

U.S. Trustee  
318 Customs House  
701 Broadway  
Nashville, TN 37203

Timothy A. Davis, Esq.  
115 East Main Street  
Lebanon, TN 37087

Dated: May 28, 2015.

/s/ Joseph P. Rusnak  
Joseph P. Rusnak

## **EXHIBIT A**

1. The debtor, Kevin Christopher Sharpton (the "Debtor"), is requested to deliver to Tune, Entrekin & White, P.C. on the date specified by the Court the following documents:

- a. Copies of all federal and state income tax returns filed on behalf of the Debtor for the years 2012, 2013, and 2014.
- b. Copies of all personal bank statements and stock brokerage account statements for the past 12 months;
- c. Copies of all business bank statements for the past 12 months;
- d. Proof of Debtor's year-to-date 2015 income;
- e. Details of business income and expenses (Schedule I, Item No. 8a);
- f. All financial statements prepared by or for the Debtor; and
- g. A copy of Debtor's divorce decree.

If a document is withheld on the basis of a claimed privilege, then please state with respect thereto:

- i) the privilege upon which you are relying;
- ii) the type of document; and
- iii) the date, author, and general subject matter of the document.

The term "document" is used herein in its broadest sense and includes any kind of written or graphic matter, however, produced or reproduced, of any kind or description, including without limitation, papers, books, letters, photographs, objects, tangible things, correspondence, telegrams, cables, telex messages, memoranda, notes, notations, work papers, transcripts, minutes, reports, drawings, blueprints, telephone facsimile

transmissions and tape recordings of any type or size and any recording of telephone or other conversations, or interviews, conferences, or other meetings, affidavits, statements, summaries, opinions, reports, studies, analyses, evaluations, contracts, agreements, journals, statistical reports, desk calendars, appointment books, diaries, lists, tabulations, summaries, sound recordings, computer printouts, data processing input and output, microfilms, and all other records kept by electronic, photographic or mechanical means, and things similar to any of the foregoing, however denominated.

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